

LAWYERS



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November 20, 2007

**By Hand Delivery**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D. C. 20554

FILED/ACCEPTED

NOV 20 2007

Federal Communications Commission  
Office of the Secretary

**Re: In the Matter of Section 63.71 Application of Comcast Phone of Minnesota, LLC**

Dear Ms. Dortch:

Enclosed please find the original and four (4) copies of the Application of Comcast Phone of Minnesota, LLC for Authority to Discontinue the Provision of Comcast Digital Phone Service to certain customers in Minnesota.

Also enclosed is an extra copy of this filing which we ask be stamped to acknowledge receipt and returned to our messenger.

Thank you for your assistance.

Sincerely,

Michael C. Sloan  
Brian J. Hurh  
Counsel to Comcast Phone of Minnesota, LLC

Enclosure

cc: Rodney McDonald, Wireline Competition Bureau FCC  
Kimberly Jackson, Wireline Competition Bureau, FCC  
Secretary of Defense  
Hon. Tim Pawlenty, Governor, State of Minnesota  
Minnesota Public Utilities Commission

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
Section 63.71 Application of )  
Comcast Phone of Minnesota, LLC )

File No. \_\_\_\_\_

for Authority Pursuant to )  
Section 214 of the Communications )  
Act to Discontinue the Provision )  
of Comcast Digital Phone )  
Service in Minnesota )

**SECTION 63.71 APPLICATION**

Comcast Phone of Minnesota, LLC d/b/a Comcast Digital Phone ("Comcast Phone"), hereby seeks authorization pursuant to Section 214(a) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(a), and Section 63.71 of the Commission's Rules, 47 C.F.R. § 63.71, to discontinue its provision of Comcast Digital Phone service to its customers in Minnesota. In support of this Application, Comcast Phone provides the following information:

**I. Information Required by 47 C.F.R. § 63.71(a)(1) – (a)(4)**

**1. Name and Address of Carrier**

Comcast Phone of Minnesota, LLC  
1500 Market Street  
Philadelphia, PA 19102  
Attn: Brian A. Rankin

**2. Date of Planned Service Discontinuance**

Comcast Phone plans to discontinue the provision of its Comcast Digital Phone service in Minnesota on or after January 10, 2008, but no earlier than 31 days after the Commission releases public notice of this filing. Further, the proposed January 10, 2008 disconnection will be a "soft disconnect" only. Customers will continue to be able to call emergency services ("911") as well as the Comcast Phone call center until February 10, 2008 (or one month after the authorized disconnection date).

**3. Points of Geographic Areas of Service Affected**

Comcast Phone currently provides interstate (and intrastate) telecommunications service throughout Minnesota. Comcast Phone is following the appropriate state law for discontinuance of the applicable Comcast Digital Phone service in the state. Comcast Phone will assist affected customers during their transition to new carriers.

**4. Description of Type of Service Affected**

Pursuant to this application, Comcast Phone seeks authority to discontinue its Comcast Digital Phone service in the State of Minnesota.

**II. Notice to Customers**

In accordance with 47 C.F.R. § 63.71(a), Comcast Phone has notified all affected customers of the planned discontinuance of its Comcast Digital Phone service. Specifically, Comcast Phone sent letters via first class U.S. Mail to each of the affected customers on October 31, 2007, which included all the information required by 47 C.F.R. § 63.71(a)(1) – (a)(4), as well as the statement applicable to non-dominant carriers set forth in 47 C.F.R. § 63.71(a)(5)(i). Copies of the notification letters are provided as Attachments 1 and 2. Attachment 2 was mailed

to customers who have asked that Comcast not send them any solicitations. Attachment 1 was sent to all other Comcast Digital Phone customers.

**III. Notice to States and the Dept. of Defense**

In accordance with 47 C.F.R. 63.71(a), Comcast Phone has mailed a copy of this Application to the Governor of Minnesota, the Minnesota Public Utilities Commission, and the Secretary of Defense.

**IV. Non-Dominant Status**

Comcast Phone is a non-dominant carrier in the local exchange, interstate, and interexchange services markets.

**V. Designated Contacts**

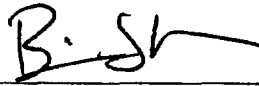
Correspondence concerning this Application should be directed to:

Michael C. Sloan  
Davis Wright Tremaine, LLP  
1919 Pennsylvania Avenue, N.W.  
Suite 200  
Washington, DC 20006  
(202) 973-4227  
[michaelsloan@dwt.com](mailto:michaelsloan@dwt.com)

WHEREFORE, Comcast Phone of Minnesota, LLC respectfully requests that the Commission authorize it to discontinue Comcast Digital Phone service in the state of Minnesota on or after January 10, 2008, or 31 days after the Commission releases public notice of this filing, which ever date is earlier.

Respectfully submitted:

By:



Michael C. Sloan  
Brian J. Hurh  
Davis Wright Tremaine, LLP  
1919 Pennsylvania Ave., N.W., Suite 200  
Washington, D.C. 20006  
Telephone: (202) 973-4227  
Facsimile: (202) 973-4499

Counsel for Comcast Phone of Minnesota, LLC

Dated: November 20, 2007

**Attachment 1**  
**Sample Customer Notification Letter**



Comcast Cable  
10 River Park Plaza  
St. Paul, MN 55107

October 31, 2007

**Dear Valued Comcast Customer,**

Thank you for being a loyal Comcast Digital Phone customer. This letter is to again inform you that Comcast is changing its telephone service offerings and that effective on or shortly after January 10, 2008, Comcast will provide telephone services only through its Digital Voice product line, and will no longer be providing service through its current Digital Phone product line in your community.

Your action is required! Because Comcast will be discontinuing all Digital Phone service you will need to select a new telephone service *plan*. If you wish to retain your current telephone number and continuity of service, you must act soon. You may select the service provider of your choice and you must also select a new long distance provider if you use Comcast Digital Phone for your long distance service.

Comcast is making this change to provide our customers with the best voice services available. Because we value your business, we want to let you know that you do not have to select a new service provider. You can remain a Comcast customer by subscribing to our Comcast Digital Voice service and experience the simplicity, convenience and value of our new residential home phone service, for just \$19.95 a month for the first twelve months, plus free installation.\* With Comcast Digital Voice service, you won't have to worry about complicated calling plans or calling rates that fluctuate based on the time of day. You'll enjoy *unlimited* calling to anyone, anytime, anywhere throughout Minnesota, the U.S., Canada and Puerto Rico.

With Comcast Digital Voice you can also enjoy all these benefits:

- 12 popular calling features such as Caller ID, Call Waiting, Three-way calling and more, plus Voice Mail
- Free and easy installation—works with existing phones and jacks
- Keep your current phone number
- 30-day money back guarantee
- No contract requirement
- Enhanced 9-1-1, which means your home address and telephone number are automatically sent to your local emergency services dispatcher if you call 9-1-1

We are confident you'll agree that Comcast Digital Voice is a simple and easy way to meet your local, in-state and long distance calling needs. If you switch to Comcast Digital Voice, you will also have the added convenience of receiving one bill for all of your Comcast services. You may transfer your current service to Comcast Digital Voice today by calling Comcast at 612.460.4944.

While we appreciate your business and hope you will remain with Comcast, you should know that you also have the option to purchase local and long distance telephone service from other service providers in your area. A list of local service providers (LSPs) is attached for your convenience. Other LSPs may be identified by city by linking to the Minnesota Public Utilities Commission web page at [http://www.puc.state.mn.us/about/utility\\_providers.htm#telecom](http://www.puc.state.mn.us/about/utility_providers.htm#telecom).

This proposed discontinuance of your local telephone service is subject to regulatory approval by the Federal Communications Commission (FCC). The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no

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later than 15 days after the FCC releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the §63.71 of Comcast Phone of Minnesota, LLC. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

#### **TAKE ACTION NOW**

Regardless of whether you select Comcast Digital Voice or a different service provider, we urge you to act quickly in order to maintain active phone service. If you do not switch your service to Comcast Digital Voice or another provider before January 10, 2008, your normal phone service will be terminated and you may not be able to retain your current telephone number. Please take action NOW to avoid an interruption in your service.

If you have any questions, please call Comcast Customer Service at: 612.460.4944.

Thank you for choosing Comcast.

\*Offer expires 11/30/07. Offer may not be combined with any other offers. Comcast Digital Voice® offer available to existing Comcast Digital Phone customers only in Comcast serviceable areas (and may not be transferred), located at wired and serviceable locations. The Comcast Unlimited™ Package applies to direct-dial calls from your home to locations in the United States, Canada, Puerto Rico, US Virgin Islands, Guam and Saipan/N. Mariana Islands. No separate long distance carrier connection available. Plan does not include international calls. An EMTA (which may also be used for Comcast High-Speed Internet service) is required; Comcast's current monthly fee is \$3.00. Equipment fees are additional. After 12-month promotion, regular rates apply unless service is canceled by calling Comcast. Current monthly rate for Comcast Digital Voice is \$44.95 or \$39.95 for customers who also subscribe to Comcast High Speed Internet and Comcast Cable service. Free installation offer limited to standard installation. Custom installation charges are additional. Pricing shown does not include federal, state or local taxes and fees; our Regulatory Recovery Fee, which is not a tax or government required, or other applicable charges (e.g., per-call charges or international calling). Comcast Digital Voice® service (including 911/emergency service) may not function during an extended power outage. Certain customer premises equipment may not be compatible with Comcast Digital Voice services. Detailed account summary online is available through Comcast's monthly billing and not available as a special offered feature. Services are subject to terms and conditions of Comcast's subscriber agreements and other applicable terms and conditions. Restrictions apply. Call 612-460-4944 or visit [www.Comcast.com](http://www.Comcast.com) for details. ©2007 Comcast. All rights reserved.



**Attachment 2**  
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10 River Park Plaza  
St. Paul, MN 55107

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You do not have to select a new service *provider*, unless you choose to do so, since you can remain a Comcast customer by subscribing to our Comcast Digital Voice service.

While we appreciate your business and hope you will remain with Comcast, you should know that you also have the option to purchase local and long distance telephone service from other service providers in your area. A list of local service providers (LSPs) is attached for your convenience. Other LSPs may be identified by city by linking to the Minnesota Public Utilities Commission web page at [http://www.puc.state.mn.us/about/utility\\_providers.htm#telecom](http://www.puc.state.mn.us/about/utility_providers.htm#telecom).

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